

From: First National Bank Le Center, Gregory G Traxler

Subject: Availability of Funds and Collection of Checks

Date: Jun 12, 2004

Proposal: Regulation CC - Availability of
Funds and Collection of Checks
Document ID: R-1176
Press Release Date: 12/22/2003
Name: Gregory G Traxler
Affiliation: First National Bank Le Center
Category of
Affiliation: Commercial
Address1: 10 West MN St
Address2:
City: Le Center
State: MN
Country: UNITED STATES
Country Code: 840
Zip: 56057
PostalCode: n/a

Comments:

@@@I wish to comment on the proposal by the Fed to indemnify and hold harmless banks with regard to the imaged checks. How can you possibly allow banks to rely on an imaged based system, or in essence force them to accept, when you will not allow them to freely process these items without being held responsible for the item. To my mind this act was put forth without complete consideration. We are a very small bank in a rural setting, and would gladly have allowed our customers to continue to receive paper items. However, now you will force me to alter my processing, but will not allow me as a small entity to enjoy the same advantages of someone who has greater resources. Also, if the Fed is allowed the opportunity to be held harmless in this processing, I would hope you allow me the same. I can change the entire way I process checks, if this is the case, and this whole situation could make sense.

Another situation that arises in this instance is the practice of charging me, to produce paper items for the bank down the street who chooses to remain in the old environment. If they don't have the courage or foresight to change their environment, it will make it much more expensive for me to make this change. I'll even show them how to save money if you want me to, so they can process the same way I will be able to. I'd gladly show them how.

Please consider this information,
Let me know if you have questions.

Sincerely
Greg Traxler

IP: 67.50.14.198
User Agent: Mozilla/4.0 (compatible; MSIE 6.0;
Windows NT 5.0; .NET CLR 1.0.3705; .NET CLR 1.1.4322)